

Exhibit A

Proposed Second Stipulated Order

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

In re:

BLOCKFI INC., *et al.*,

Debtors.

BLOCKFI INC. AS THE WIND DOWN
DEBTORS,

Plaintiff,

v.

ACE AMERICAN INSURANCE
COMPANY, ARCH INSURANCE
COMPANY, AXIS INSURANCE
COMPANY, BERKLEY INSURANCE
COMPANY, BERKSHIRE HATHAWAY
SPECIALTY INSURANCE COMPANY,
ENDURANCE AMERICAN SPECIALTY
INSURANCE COMPANY, NATIONAL
UNION FIRE INSURANCE COMPANY OF
PITTSBURGH, PA, U.S. SPECIALTY
INSURANCE COMPANY, XL SPECIALTY
INSURANCE COMPANY,

Defendants.

Chapter 11

Case No. 22-19361 (MBK)

(Jointly Administered under a Confirmed Plan)

Adv. Proc. No. 24-01067 (MBK)

**SECOND STIPULATED ORDER EXTENDING DEADLINE TO
ANSWER OR OTHERWISE RESPOND TO AMENDED COMPLAINT**

The relief requested on the following pages is hereby ORDERED.

This joint stipulation and agreed order (the “Stipulated Order”) is entered into by and among plaintiff BlockFi Inc., as Wind Down Debtors (the “Plaintiff”), and defendants ACE American Insurance Company, Arch Insurance Company, Axis Insurance Company, Berkley Insurance Company, Berkshire Hathaway Specialty Insurance Company, Endurance American Specialty Insurance Company, National Union Fire Insurance Company of Pittsburgh, PA, U.S. Specialty Insurance Company, and XL Specialty Insurance Company (collectively, the “Defendants” and, together with the Plaintiff, the “Parties”).

WHEREAS, in exchange for the Defendants’ counsel accepting service of the amended complaint on behalf of their respective client(s), the Plaintiff agreed to extend the deadline for the Defendants to answer or otherwise respond to the Amended Complaint [Dkt. No. 1] (the “Response Deadline”), and the Parties entered into a stipulation memorializing that agreement, which the Court approved, on March 1, 2024 [Dkt. No. 10].

WHEREAS, the Parties have now agreed to a further extension of the Response Deadline for each of the Defendants.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the Plaintiff and the Defendants, through their respective counsel, that:

1. The Response Deadline for each of the Defendants is extended to May 10, 2024, without prejudice to each of the Parties’ rights to seek a further extension, subject to approval of the Court.
2. Defendants expressly reserve any and all rights and defenses to the allegations in the Amended Complaint.

3. This Stipulated Order may be executed in counterparts and each counterpart, when so executed and delivered, shall be deemed an original, and all counterparts, taken together, shall constitute one and the same Stipulated Order.

<p>Agreed this 25th day of March, 2024</p> <p><u>/s/ Rachel Ehrlich Albanese</u> Rachel Ehrlich Albanese (#027542001) DLA PIPER LLP (US) 1251 Avenue of the Americas New York, New York 10020 Telephone: (212) 335-4500 Facsimile: (212) 335-4501 Email: rachel.albanese@us.dlapiper.com</p> <p>Stephen C. Matthews (#055801994) DLA PIPER LLP (US) 51 John F. Kennedy Parkway, Suite 120 Short Hills, New Jersey 07078 Telephone: (973) 520-2550 Facsimile: (973) 520-2551 Email: stephen.matthews@us.dlapiper.com</p> <p>Stuart M. Brown (#026641988) DLA PIPER LLP (US) 1201 North Market Street, Suite 1200 Wilmington, Delaware 19801 Telephone: (302) 468-5700 Facsimile: (302) 397-2336 Email: stuart.brown@us.dlapiper.com</p> <p>- and -</p> <p>Stacey E. Rufe (<i>pro hac vice</i> admission pending) WERNER AHARI MANGEL LLP 2112 Pennsylvania Ave. NW Suite 200 Washington, DC 20037 Telephone: (202) 599-1013 Email: srufe@wam.law</p> <p><i>Attorneys for Defendants Arch Insurance Company, Berkley Insurance Company, Berkshire Hathaway Specialty Insurance Company, U.S. Specialty Insurance Company, and XL Specialty Insurance Company</i></p>	<p>Agreed this 25th day of March, 2024</p> <p><u>/s/ Stephen D. Palley</u> Stephen D. Palley (<i>pro hac vice</i> forthcoming) Daniel J. Healy (<i>pro hac vice</i> forthcoming) John G. Doyle (#045872005) BROWN RUDNICK LLP 601 Thirteenth Street NW, Suite 600 Washington, DC 20005 Telephone: (202) 536-1766 Facsimile: (617) 289-0766 Email: spalley@brownrudnick.com dhealy@brownrudnick.com jdoyle@brownrudnick.com</p> <p>Kenneth J. Aulet BROWN RUDNICK LLP Seven Times Square New York, New York 10036 Telephone: (212) 209-4800 Facsimile: (212) 209-4801 Email: kaulet@brownrudnick.com</p> <p>Tristan G. Axelrod BROWN RUDNICK LLP One Financial Center Boston, Massachusetts 02111 Telephone: (617) 856-8200 Facsimile: (617) 856-8201 Email: taxelrod@brownrudnick.com</p> <p>- and -</p> <p>Daniel M. Stolz Jennifer Borek GENOVA BURNS LLC 494 Broad Street Newark, New Jersey 07102 Telephone: (973) 533-0777 Facsimile: (973) 535-7107 Email: dstolz@genovaburns.com jborek@genovaburns.com</p> <p><i>Attorneys for Plaintiff</i></p>
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<p>Agreed this 25th day of March, 2024</p> <p><u>/s/ Seth D. Griep</u></p> <p>Seth D. Griep KAUFMAN DOLOWICH, LLP 25 Main Street, Suite 500 Hackensack, New Jersey 07601 Telephone: (201) 488-6655 Facsimile: (201) 488-6652 Email: sgriep@kaufmandolowich.com</p> <p>Kevin J. Windels (Admitted Pro Hac Vice) KAUFMAN DOLOWICH, LLP 40 Exchange Place, 20th Floor New York, NY 10005 Telephone: (212) 485-9977 Email: kwindels@kaufmandolowich.com</p> <p><i>Attorney for Endurance American Specialty Insurance Company</i></p>	<p>Agreed this 25th day of March, 2024</p> <p><u>/s/ Robert A. Benjamin</u></p> <p>Robert A. Benjamin KAUFMAN BERGEEST & RYAN LLP 200 Summit Lake Drive Valhalla, New York 10595 Telephone: (914) 449-1059 Facsimile: (914) 449-1100 Email: rbenjamin@kbrlaw.com</p> <p><i>Attorney for National Union Fire Insurance Company of Pittsburgh, PA</i></p>
<p>Agreed this 25th day of March, 2024</p> <p><u>/s/ Jessica E. La Londe</u></p> <p>Jessica E. La Londe (<i>pro hac vice</i> forthcoming) DUANE MORRIS LLP One Marke Plaza, Suite 2200 San Francisco, California 94105-1127 Telephone: (415) 957-3225 Facsimile: (415) 520-9395 Email: jelalonde@duanemorris.com</p> <p>Wendy M. Simkulak DUANE MORRIS LLP 30 South 17th Street Philadelphia, PA 19103-4196 Facsimile: (215) 689-4951 Telephone: (215) 979-1547 Email: WMSimkulak@duanemorris.com</p> <p><i>Attorneys for ACE American Insurance Company</i></p>	<p>Agreed this 25th day of March, 2024</p> <p><u>/s/ Mark D. Sheridan</u></p> <p>Mark D. Sheridan SQUIRE PATTON BOGGS (US) LLP 382 Springfield Avenue Summit, New Jersey 07901 Telephone: (973) 848-5681 Facsimile: (973) 848-5601 Email: mark.sheridan@squirepb.com</p> <p><i>Attorney for Axis Insurance Company</i></p>